

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	CIVIL ACTION
EUCLIDES SOTO, LOUIS A. MARTINEZ,)	NO.: 04-10892-JLT
JOSE RAMIREZ, CLEMENTE HERNANDEZ,)	
CESAR PIZARO, ELISON PENA,)	
JUAN COLON, JOSE ORTIZ,)	
RAFAEL TORRES, ANGEL BAEZ,)	
ANTONIO MARTINEZ, WILFREDO ORTIZ,)	
EULOGIO ORTIZ, MIRRRAIN MIRANDA,)	
RAFAEL MORENO, NELSON ACEVEDO,)	
and RAMON RODRIGUEZ,)	
Plaintiffs,)	
)	
v.)	
)	
SHERMAN-FEINBERG CORPORATION,)	
FARNSWORTH FIBRE CORPORATION,)	
UNITED STEELWORKERS OF AMERICA,)	
LOCAL 421-U, AND UNITED STEELWORKERS))	
OF AMERICA,)	
Defendants.)	
)	

MOTION TO PERMIT THE FILING OF A BRIEF EXCEEDING 20 PAGES

The plaintiffs move to permit them to file a brief exceeding 20 pages.

1. Regarding the attachment motion, the United Steelworkers of America filed a brief in excess of 20 pages.
2. The defendants' arguments covered a number of topics, which required factual and legal analysis in detail.
3. The factual and legal arguments which in the interest of justice require careful consideration demand a detailed response of the plaintiffs.

WHEREFORE, the plaintiffs request the permission of the court to file an memorandum exceeding 20 pages.

Respectfully submitted,

Dated: March 8, 2006

/s/ Robert O. Berger
Robert O. Berger (BBO#: 038900)
11 Beacon Street, Ste. 1210
Boston, MA 02108
(617) 423-7575 Tel
(617) 275-8000 Fax
Attorney for Plaintiffs

/s/ John Lee Diaz
John Lee Diaz (BBO#: 542819)
801A Tremont Street
Boston, MA 02118
(617) 445-7900 Tel
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served by electronic transfer on the attorney of record for each party.

Dated: March 8, 2006

/s/ Robert O. Berger
Robert O. Berger (BBO#: 038900)